

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

BOY SCOUTS OF AMERICA,

Plaintiff,

v.

A.A., *et al.*,

Defendants.

Adv. Pro. No. 20-50527 (LSS)

NOTICE OF **AMENDED**<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON MARCH 17, 2021, AT 10:00 A.M. (ET)

<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

<sup>2</sup> **Amended items appear in bold.**

**This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by March 17th at 8:00 a.m.**  
**COURTCALL WILL NOT BE USED FOR THIS HEARING.**  
**Please use the following link to register for this hearing:**

<https://debuscourts.zoomgov.com/meeting/register/vJlsc-CqpjgpHb-IZx5yaG9gmt0RcsyyyYY>

**After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.**

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.**

Topic: Boy Scouts of America

**Time: March 17, 2021, at 10:00 AM Eastern Time (US and Canada)**

**RESOLVED MATTER:**

1. Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Exact Duplicate Claims, (II) Amended and Superseded Claims, and (III) Incorrect Debtor Claims (Non-Abuse Claims) ([D.I. 2019](#), Filed 2/3/21).

Objection Deadline: February 23, 2021, at 4:00 p.m. (ET)

Responses Received:

- a) Informal comments from Richard Lehr; and
- b) Informal comments from CPC Neutek.

Related Pleadings:

- a) Certification of Counsel Regarding Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Exact Duplicate Claims, (II) Amended and Superseded Claims, and (III) Incorrect Debtor Claims (Non-Abuse Claims) ([D.I. 2314](#), filed 3/3/21);
- b) Order Sustaining Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Exact Duplicate Claims, (II) Amended and Superseded Claims and (III) Incorrect Debtor Claims (Non-Abuse Claims) ([D.I. 2323](#), filed 3/5/21).

Status: An Order has been entered. No hearing is necessary.

MATTER UNDER CERTIFICATION:

2. Debtors' Second Omnibus (Substantive) Objection to Certain (I) Cross-Debtor Duplicate Claims, (II) Substantive Duplicate Claims, (III) No Liability Claim, (IV) Misclassified Claims, and (V) Reduce and Allow Claims (Non-Abuse Claims) ([D.I. 2020](#), Filed 2/3/21).

Objection Deadline: February 23, 2021 at 4:00 p.m. (ET)

Responses Received:

- a) Informal comments from Jeffrey Hway;
- b) Informal comments from White Wilderness, Inc.;
- c) Informal comments from Joseph Coco;
- d) Informal comments from Los Angeles County Treasurer and Tax Collector; and
- e) Informal comments from SupplyOne Rockwell, Inc.

Related Pleadings:

- a) Certification of Counsel Regarding Debtors' Second Omnibus (Substantive) Objection to Certain (I) Cross-Debtor Duplicate Claims, (II) Substantive Duplicate Claims, (III) No Liability Claim, (IV) Misclassified Claims, and (V) Reduce and Allow Claims (Non-Abuse Claims) ([D.I. 2315](#), filed 3/3/21).

Status: A certification of counsel has been filed. No hearing is necessary for this matter unless the Court has any questions.

ADJOURNED MATTERS

3. Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2028](#), Filed 2/3/21).

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Kosnoff Law's Omnibus Objection to Hartford's and Century's Motions to Compel ([D.I. 2142](#), Filed 2/10/21); and
- b) Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C.'s Omnibus Response to (I) Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting

Andkosnoff Law PLLC to Submit Rule 2019 Disclosures and (II) Century's Motion to Compel Abused in Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2143](#), Filed 2/10/21).

Related Pleadings:

- a) Reply in Support of Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2170](#), Filed 2/11/21); and
- b) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Hartford's Motion to Compel Abused in Scouting and Kosnoff Law PLLC to Submit Rule 2019 Disclosures ([D.I. 2181](#), Filed 2/11/21).

Status: This matter is adjourned to a date to be determined.

- 4. Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2029](#), Filed 2/3/21).

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received: None.

Related Pleadings:

- a) Joinder by Agricultural Insurance Company to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2132](#), Filed 2/10/21);
- b) Joinder, Response and Objection to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2144](#), Filed 2/10/21);
- c) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2182](#), Filed 2/11/21);
- d) Century's Reply in Support of Its Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2198](#), Filed 2/15/21); and

- e) Corrected Response to Century's Motion to Compel Ichor Consulting, LLC to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2208](#), Filed 2/12/21).

Status: This matter is adjourned to a date to be determined.

- 5. Century's Motion to Compel Abused In Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2030](#), Filed 2/3/21).

Objection Deadline: February 10, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Limited Objection of the Coalition of Abused Scouts for Justice to Century's Motion to Compel [D.I. 2030] ([D.I. 2135](#), Filed 2/10/21);
- b) Kosnoff Law's Omnibus Objection to Hartford's and Century's Motions to Compel ([D.I. 2142](#), Filed 2/10/21); and
- c) Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C.'s Omnibus Response to (I) Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company's Motion to Compel Abused in Scouting And Kosnoff Law PLLC to Submit Rule 2019 Disclosures and (II) Century's Motion to Compel Abused in Scouting, Kosnoff Law PLLC, and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2143](#), Filed 2/10/21).

Related Pleadings:

- a) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Century's Motion to Compel Abused in Scouting and Kosnoff Law PLLC and the Coalition to Submit the Disclosures Required by Federal Rule of Bankruptcy Procedure 2019 ([D.I. 2183](#), Filed 2/11/21).

Status: This matter is adjourned to a date to be determined.

MATTERS GOING FORWARD AS A STATUS CONFERENCE

6. Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2293](#), Filed 3/1/21).

Related Pleadings:

- a) Disclosure Statement for the Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC ([D.I. 2294](#), Filed 3/1/21).

Status: At the request of the Court, this matter is going forward as a status conference.

7. [SEALED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 1971, Filed 1/22/21).

Objection Deadline: February 5, 2021, at 4:00 p.m. (ET). Extended to February 15, 2021 at 4:00 p.m. (ET) for the Law Office of Carmen L. Durso.

Responses Received:

- c) [SEALED] Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 2046, Filed 2/5/21);
- d) [REDACTED] Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2048](#), Filed 2/5/21);
- e) Statement of Interest Regarding Certain Discovery Motions ([D.I. 2049](#), Filed 2/5/21);
- f) Bailey Cowan Heckaman PLLC's Joinder in the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2054](#), Filed 2/5/21);
- g) Objection, Joinder and Reservation of Rights of James Harris Law, PLLC to the Objection of Various Law Firms to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2059](#), Filed 2/5/21);

- h) Joinder of Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2061](#), Filed 2/5/21);
- i) Claimant No. 40573's Objection to Hartford and Century's Motion for Entry of an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2066](#), Filed 2/5/21);
- j) Joinder by Various Child Sexual Abuse Tort Claimants, to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2069](#), Filed 2/5/21);
- k) Joinder to the Coalition of Abused Scouts for Justice's Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2077](#), Filed 2/5/21);
- l) Joinder by Claimant 55101 to the Coalition of Abused Scouts for Justice's Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2079](#), Filed 2/5/21);
- m) Junell & Associates Joinder to the Objections of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2081](#), Filed 2/5/21);
- n) Joinder by Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2082](#), Filed 2/5/21);
- o) Objection of Schneider Wallace Cottrell Konecky, on behalf of Claimants 18867, 43995, and 50263, to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2085](#), Filed 2/5/21);
- p) **[WITHDRAWN]** PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2088](#), Filed 2/5/21);

- q) Joinder of Schneider Wallace Cottrell Konecky, on behalf of Claimants 18867, 43995, and 50263, in the Objection of Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objection ([D.I. 2089](#), Filed 2/5/21);
- r) Napoli Shkolnik PLLC's Opposition to Hartford and Century's Motions for (1) an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (2) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2090](#), Filed 2/5/21);
- s) **[WITHDRAWN]** Crew Janci Claimants' Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2092](#), Filed 2/5/21);
- t) [Corrected] Joinder by Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2094](#), Filed 2/5/21);
- u) Corrected Objection of Steven C. Babin, Jr. and Babin Law, LLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [D.I. 1974] and Joinder to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [DK 2046] ([D.I. 2098](#), Filed 2/5/21);
- v) Joinder by Claimant No. 5502 to PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2099](#), Filed 2/5/21);
- w) Joinder by Claimant Nos. 26704, 31245, 31384, 35542 and 41005 to PCVA Claimants' Objections to Hartford and Century's Request for 2004 Examinations ([D.I. 2100](#), Filed 2/5/21);
- x) Joinder of Marc J. Bern & Partners LLP to the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2101](#), Filed 2/5/21);
- y) Merson Law Claimant's Joinder to PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2107](#), Filed 2/6/21);



- z) Porter & Malouf, P.A.'s Joinder in the Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2108](#), Filed 2/6/21);
- aa) Supplement to Objection of the Coalition of Abused Scouts for Justice to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections [D.I. 1972] ([D.I. 2184](#), Filed 2/11/21); and
- bb) Objection of John Doe No. 59969 to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2217](#), Filed 2/16/21).

Related Pleadings:

- c) [REDACTED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 1972](#), Filed 1/22/21);
- d) Joinder by Agricultural Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 1979](#), Filed 1/25/21);
- e) Notice of Filing Revised Proposed Redacted Version of Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2007](#), Filed 2/2/21);
- f) Joinder by Travelers Casualty and Surety Company, Inc. (FKA Aetna Casualty & Surety Company), St. Paul Surplus Line Insurance Company and Gulf Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2008](#), Filed 2/2/21);
- g) [SEALED] Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections (D.I. 2009, Filed 2/2/21);
- h) The Allianz Insurers' Joinder to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2026](#), Filed 2/3/21);

- i) Joinder by the Continental Insurance Company to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2065](#), Filed 2/5/21);
- j) AIG's Joinder to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2070](#), Filed 2/5/21);
- k) Joinder by General Star Indemnity Company to Hartford & Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2136](#), Filed 2/10/21);
- l) Joinder of Liberty Mutual Insurance Company to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections; and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2168](#), Filed 2/11/21);
- m) Reply in Support of Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2169](#), Filed 2/11/21);
- n) Notice of Withdrawal of the Crew Janci Claimants' Objection to Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections ([D.I. 2205](#), Filed 2/16/21); and
- o) Notice of Withdrawal of PCVA Claimants' Objections to Hartford and Century's Request for Rule 2004 Examinations ([D.I. 2212](#), Filed 2/16/21).

Status: At the request of the Court, this matter is going forward as a status conference.

8. [SEALED] Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims (D.I. 1974, Filed 1/22/21).

Objection Deadline: February 5, 2021, at 4:00 p.m. (ET).

Responses Received:

- a) Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2043](#), Filed 2/5/21);

- b) Statement of Interest Regarding Certain Discovery Motions ([D.I. 2049](#), Filed 2/5/21);
- c) Objection of Bailey Cowan Heckaman PLLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2053](#), Filed 2/5/21);
- d) Objection, Joinder and Reservation of Rights of James Harris Law, PLLC to the Objection of Various Law Firms to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2060](#), Filed 2/5/21);
- e) Joinder of Eisenberg, Rothweiler, Winkler, Eisenberg & Jeck, P.C. to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2062](#), Filed 2/5/21);
- f) Joinder by Various Child Sexual Abuse Tort Claimants to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2074](#), Filed 2/5/21);
- g) Objection of Timothy D. Kosnoff, Esquire to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2076](#), Filed 2/5/21);
- h) Joinder of Krause and Kinsman to the Coalition of Abused Scouts for Justice Objection to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2078](#), Filed 2/5/21);
- i) Junell & Associates, PLLC's Joinder to the Objections of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2084](#), Filed 2/5/21);
- j) [SEALED] Objection of Andrews & Thornton, Attorneys at Law and Ask LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery (D.I. 2086, Filed 2/5/21);
- k) Joinder of Timothy D. Kosnoff, Esquire to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2087](#), Filed 2/5/21);
- l) Napoli Shkolnik PLLC's Opposition to Hartford and Century's Motions for (1) an Order (I) Authorizing Certain Rule 2004 Discovery, and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (2) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2090](#), Filed 2/5/21);

- m) Joinder of Slater Schulman LLP to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2091](#), Filed 2/5/21);
- n) Joinder by D. Miller & Associates PLLC to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2093](#), Filed 2/5/21);
- o) [REDACTED] Objection of Andrews & Thornton, Attorneys at Law and Ask LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery ([D.I. 2095](#), Filed 2/5/21);
- p) Corrected Objection of Steven C. Babin, Jr. and Babin Law, LLC to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [D.I. 1974] and Joinder to the Objection of the Coalition of Abused Scouts for Justice to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims [DK 2046] ([D.I. 2098](#), Filed 2/5/21);
- q) Objection of Marc J. Bern & Partners LLP to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974] ([D.I. 2102](#), Filed 2/5/21);
- r) Joinder by Andrus Wagstaff, PC to the Objection of the Coalition of Abused Scouts for Justice to the Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claims ([D.I. 2117](#), Filed 2/8/21); and
- s) Motion of the Coalition of Abused Scouts for Justice to File Sur-Reply to Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2196](#), Filed 2/15/21).

Related Pleadings:

- a) [REDACTED] Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 1975](#), Filed 1/22/21);
- b) Notice of Filing Revised Proposed Redacted Version of Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2022](#), Filed 2/3/21);
- c) The Allianz Insurers' Joinder to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2026](#), Filed 2/3/21);

- d) AIG'S Joinder to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2114](#), Filed 2/8/21);
- e) Joinder of Liberty Mutual Insurance Company to (A) Hartford and Century's Motion for an Order (I) Authorizing Certain Rule 2004 Discovery and (II) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections; and (B) Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim ([D.I. 2168](#), Filed 2/11/21);
- f) [SEALED] Reply to Motion for 2004 Discovery (D.I. 2171, Filed 2/11/21);
- g) Declaration of Andrew Kirschenbaum in Support of Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974, Revised Public Version D.I. 2022] ([D.I. 2173](#), Filed 2/11/21);
- h) Supplemental Declaration of Paul J. Hinton ([D.I. 2174](#), Filed 2/11/21);
- i) [SEALED] Declaration in Support of Erich J. Speckin (D.I. 2175, Filed 2/11/21);
- j) [SEALED] Declaration in Support of Charles Fox (D.I. 2177, Filed 2/11/21);
- k) Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 1974, Revised Public Version of D.I. 2022] ([D.I. 2180](#), Filed 2/11/21); and
- l) Timothy D. Kosnoff, Esquire's Motion to Strike Insurers' Reply Brief in Support of Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim [D.I. 2180] ([D.I. 2204](#), Filed 2/16/21).

Status: At the request of the Court, this matter is going forward as a status conference.

#### ADVERSARY PROCEEDING

*Boy Scouts of America v. AA, et al.*. Adv. Pro. No. 20-50527 (LSS)

1. The BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 144](#), filed 2/22/21).

Objection Deadline: March 8, 2021.

Responses Received:

- a) Century's Joinder in Support of the Unopposed Relief Requested in BSA's Motion to Extend the Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Objection to the Stipulation and Proposed Order ([D.I. 152](#), filed 3/9/21).

Related Pleadings:

- a) Opening Brief in Support of The BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 145](#), filed 2/22/21);
- b) Declaration of Brian Whittman in Support of The BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 146](#), filed 2/22/21);
- c) Joinder of the Ad Hoc Committee of Local Counsils in BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 148](#), filed 3/4/21);
- d) Joinder by Agricultural Insurance Company to BSA's Motion to Extend Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 150](#), filed 3/8/21);
- e) Notice of Fourth Stipulation by and Among the Boy Scouts of America, the Official Committee of Survivors of Abuse, and the Official Committee of Unsecured Creditors Modifying the Consent Order Granting The BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 and Further Extending the Termination Date of the Standstill Period ([D.I. 151](#), filed 3/8/21);
- f) PCVA Claimants' Joinder to Stipulation Regarding Preliminary Injunction ([D.I. 153](#), filed 3/9/21);
- g) Reply of Boy Scouts of America to Century's Objection to the Fourth Stipulation Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. §§ 105(a) and 362 ([D.I. 156](#), filed 3/15/21); **and**
- h) Joinder of the Tort Claimants' Committee to Reply of Boy Scouts of America to Century's Objection to the Fourth Stipulation Modifying the Consent Order Granting the BSA's Motion for a Preliminary Injunction Pursuant to 11 U.S.C. 11 U.S.C. §§ 105(a) and 362 ([D.I. 158](#), filed 3/15/21).**

Status: This matter is going forward. The Debtors are not aware of any witnesses intended to be called regarding this matter, but the Debtors reserve all rights regarding witnesses, including the right to examine witnesses should they be called.

Dated: March 16, 2021  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Eric W. Moats

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